

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

ALMA M. GONZALEZ, SHERMAN D.)	
SPRADLEY and AHMED A. DUALE,)	
individually and on behalf of others)	
similarly situated,)	Case No. 0:14-cv-04192-HB
)	
Plaintiffs,)	
)	
v.)	
)	
TURKEY VALLEY FARMS, LLC, and)	
LIFE-SCIENCE INNOVATIONS, LLC,)	
)	
Defendants.)	
)	

**JOINT MOTION FOR PRELIMINARY APPROVAL OF SETTLEMENT,
CERTIFICATION OF FLSA AND RULE 23 CLASSES FOR SETTLEMENT
PURPOSES ONLY, AND APPROVAL OF PROPOSED NOTICE OF
SETTLEMENT**

Subject to Court approval, Plaintiffs Alma M. Gonzalez, Sherman D. Spradley, and Ahmed A. Duale (“Plaintiffs”) and Defendants Turkey Valley Farms, LLC and Life-Science Innovations, LLC (“Defendants”) (collectively “the Parties”) have settled Plaintiffs’ claims against Defendants. The proposed settlement resolves the claims of Plaintiffs and provides an opportunity for similarly situated persons to join the case and participate in the settlement. For the reasons set forth in the Memorandum in Support of the Parties’ Joint Motion, filed contemporaneously herewith, the parties jointly request that the Court: (1) preliminarily approve the parties’ Settlement Agreement and Release; (2) conditionally certify a proposed Fair Labor Standards Act collective action under 29

U.S.C. § 216(b) for settlement purposes only; (3) provisionally certify a proposed state law class pursuant to Fed. R. Civ. P. 23 for settlement purposes only; (4) approve the parties' proposed Notice of Settlement for distribution to the potential class members; and (5) schedule a final fairness hearing on a date after the notice and claim period has expired, and at least 100 days after the entry of the order of preliminary approval.

Respectfully and jointly submitted this 9th day of September, 2015.

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CERTIFICATE OF SERVICE

The undersigned, an attorney, certifies that on September 9, 2015, he caused a true and correct copy of the foregoing **JOINT MOTION FOR PRELIMINARY APPROVAL OF SETTLEMENT, CERTIFICATION OF FLSA AND RULE 23 CLASSES FOR SETTLEMENT PURPOSES ONLY, AND APPROVAL OF PROPOSED NOTICE OF SETTLEMENT** to be filed with the Court by electronic filing protocols, and that same will therefore be electronically served upon all attorneys of record registered with the Court's ECF/CM system.

By: /s/D. Christopher Lauderdale